CCI PRIVACY POLICY & NOTICE

Effective: December 1, 2018

For the purposes of the General Data Protection Regulation 2016/679 (the "GDPR"), the Data Controller is the Competency and Credentialing Institute operating in Denver, Colorado at 2170 S. Parker Road, Suite #120, Denver, CO., USA.

The CCI Privacy Manager is responsible for responding to and overseeing questions in relation to this Notice for the purposes of the GDPR.

If you have any questions or concerns about this Notice, please contact us at <u>privacy@cc-institute.org</u>.

Alternatively, you can contact us by phone at 303.695.9566, or via mail at:

Competency and Credentialing Institute, 2170 S. Parker Road, Ste #120, Denver, CO, 80231.

HOW CCI COLLECTS YOUR PERSONAL DATA

Personal Data you provide CCI

CCI may collect and process the following Personal Data:

- **Contact information**, which you provide when corresponding with CCI by phone, e-mail or otherwise. This includes information you provide when you participate in discussion boards, email threads, or other social media functions on our Site. The information you give us may include your name, address, e-mail address, phone number, financial information and/or credit card information.
- Information about your certification or certification status, including your name, contact details such as address, phone number and email address (business or personal), age, employer, job title, years of experience, academic degrees or other certifications obtained, government identification numbers (e.g. social security number, passport number etc.), RN license number, and any other information related to your certification. This information may be provided by you during the application process for certification or recertification, or by your employer on your behalf.
- **Payment information,** including financial information such as credit/debit card and/or checking account numbers used to obtain or renew your certification.
- **Purchase information**, relating to purchases made by certificants and non-certificants of CCI courses or events, books, reports, articles or newsletters, either in-person or via our Site. This also included complimentary access to the above referenced occasions or items. Purchase

information includes financial information as well as information concerning the content and time of the purchase.

- **Disciplinary information,** relating to ethics/disciplinary program policies in which complaints against certificants are filed and adjudicated, with the result being possible suspension/revocation of a CCI credential. This may include extensive information about a certificant's business, or professional activities, including employment information, and similar information relating to other individuals involved in the investigation.
- **Certification information**, relating to certification programs, in which members are granted certification if they meet specified educational/employment experience requirements and/or pass an exam. This may include extensive information about the experience/performance of those certified. Where business and other professional institutions or organizations are concerned, this may include similar information identifying employees and other members of staff including volunteers.

Personal data CCI collects from you

With regard to each of your visits to our Website, CCI may automatically collect the following information:

- **Technical information,** including the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- Information about your visit, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number and location information

Personal Data CCI collects from others

CCI may receive information about you from publicly available and third-party databases, or from businesses and services that provide information about businesses or people, that we believe will help us identify and provide products and services that may be of interest to you. We will obtain your consent before contacting you if required by the law of the country in which you are located.

Non-Personal Data

CCI collects information that is sent to us automatically by your web browser and we may use this information to generate aggregate statistics about visitors to our website, including, without limitation:

- IP addresses
- Browser type and plug-in details
- Device type (e.g., desktop, laptop, tablet, phone, etc.)
- Operating system

Local time zone

CCI may use non-Personal Data for various business purposes, such as providing customer service, fraud prevention, market research, and improving our website. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

HOW CCI USES YOUR PERSONAL DATA

CCI will only process your Personal Data, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party, (e.g. processing of certification or recertification applications) (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights, interests, and/or provisions under GDPR.

Personal Data that you give us

CCI may use Personal Data that you provide directly to us for the following purposes:

- to carry out our obligations arising from your certification, or any other contract entered into between you and CCI, and to provide you with the information, products and services that you request from us
- to organize events that you have purchased or registered for, and to provide you with information, and other materials, relating to the content of the event, the speakers, sponsors and other attendees;
- to provide our newsletter and other publications, provided you have given your consent;
- to respond to your questions and provide related certification or recertification services;
- to provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- to provide you, or permit selected third parties to provide you, with information about events, products or services we feel may interest you, provided you have given your consent;
- to transfer your information as part of a merger or sale of any CCI business units, operations, or components;
- to notify you about changes to any services provided by CCI; and
- to ensure that content from our website is presented most effectively for you and your computer.

Information CCI collects about you

CCI will use Personal Data that we have collected about your use of our website:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented most effectively for you and your computer;
- as part of our efforts to keep our website safe and secure;
- to measure or understand the effectiveness of our marketing and advertising efforts and to deliver relevant ads to you; and
- to make suggestions and recommendations to you and other users of CCI's website about goods or services that may interest you or them.

Personal Data CCI receives from other sources

CCI will combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Data for the purposes set out above (depending on the types of information we receive).

How CCI shares Data and who can access your Personal Data

CCI may share your Personal Data for the purposes described in this Notice with:

- appropriate staff members as deemed necessary to carry out the purposes of the organization
- partners, suppliers and sub-contractors, for the performance of obligations arising from desired certification, certification, or recertification, or any other contract we enter into with them or you, or to provide you with the information, products and services that you request from us
- analytics and search engine providers that assist us in the improvement and optimization of our website
- trusted third-party companies and individuals to help us provide, analyze, and improve our website and services (including but not limited to data storage, maintenance services, database management, web analytics and payment processing)
- in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets
- if CCI or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.

CCI will only transfer your Personal Data to trusted third-parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures.

Selling your Personal Data

CCI does not currently engage in the sale of candidate or certificant data, nor will ever sell your Personal Data to third parties without your opt-in consent.

Security

CCI uses security measures to help protect your Personal Data against loss, misuse or unauthorized disclosure, but cannot guarantee the security of information transmitted to us over the internet.

All information you provide to CCI is stored on secure servers. Any payment transactions are encrypted using secure technology.

Transfer of Personal Data outside of the European Economic Area ("EEA") and International Users

CCI is headquartered in the United States. Your Personal Data may be accessed by us or transferred to us in the United States or to our affiliates, partners, merchants, or service providers who may be located worldwide. If you are visiting our website from outside the United States, you should be aware your information may be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated. By using CCI services, you consent to any transfer of this information.

How Long CCI Stores your Personal Data

CCI will store your Personal Data, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, CCI will try to delete your Personal Data quickly upon request.

Data Retention

CCI will retain your information for as long as your account with us is active, or as needed to provide you with our website. If you wish to request that we no longer use your information to provide you services, you should contact us at <u>privacy@cc-institute.org</u>. CCI will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. CCI maintains one or more databases to store your Personal Data and may keep such information indefinitely.

Where CCI stores your personal data

The Personal Data that you provide to us is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personal Data is submitted through our Site, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place.

Cookies and Do Not Track Policy

Our cookie policy is available to read, reference, or download from the CCI website.

Links to Third Party Sites and Services

The CCI website may contain links to third party websites, applications, and services not operated by CCI. These links are provided as a service and do not imply any endorsement by CCI of the activities or content of these sites, applications, or services; nor any association with their operators. CCI is not responsible for the privacy policies or practices of any third party, including websites or services directly linked to our website. CCI encourages visitors to review the privacy policies of any third party site that you link from our website.

YOUR RIGHTS

Correction and removal

If any of the information that we have about you is incorrect, or you wish to have information (including Personal Data) removed from our records, you may do so, please contact CCI via email at privacy@cc-institute.org or by mail at Competency & Credentialing Institute, 2170 S. Parker Road, Ste. #120. Denver, CO 80231.

Opting Out

Additionally, if you prefer not to receive marketing messages from CCI, please let us know by clicking on the unsubscribe link within any marketing message that you receive, or by sending a message to privacy@cc-institute.org

EUROPEAN RIGHTS

FOR EUROPEAN RESIDENTS ONLY. You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right by contacting us at privacy@cc-institute.org.

Under European data protection law, in certain circumstances, you have the right to:

Request access to your Personal Data. You may have the right to request access to any Personal Data we hold about you as well as related information, including the purposes for processing the Personal Data, the recipients or categories of recipients with whom the Personal Data has been shared, where possible, the period for which the Personal Data will be stored, the source of the Personal Data, and the existence of any automated decision making.

Request correction of your Personal Data. You may have the right to obtain without undue delay the correction of any inaccurate Personal Data we hold about you.

Request erasure of your Personal Data. You may have the right to request that Personal Data held about you is deleted.

Object to processing of your Personal Data. You may have the right to prevent or restrict processing of your Personal Data.

Request transfer of your Personal Data. You may have the right to request transfer of Personal Data directly to a third party where this is technically feasible.

Withdraw your consent

In addition, where you believe that CCI has not complied with its obligations under this Notice or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

You can exercise any of these rights by contacting us at privacy@cc-institute.org

CALIFORNIA RIGHTS

FOR RESIDENTS OF CALIFORNIA ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personal Data with third parties. If you reside in California and have provided your Personal Data to CCI, you may request information about our disclosures of certain categories of Personal data to third parties for direct marketing purposes. Such requests must be submitted to us via email at <u>privacy@cc-institute.org</u> or in writing at the following address:

CCI Attn: Privacy Manager 2170 S. Parker Road, Suite #120 Denver, CO 80231

CHANGES TO PRIVACY POLICIES

If CCI makes any material changes to this Notice or the way we use, share or collect personal Data, we will notify you by revising the "Effective Date" at the top of this Notice, prominently posting an announcement of the changes on our website, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to this Notice in the future will be posted on this page and, where appropriate, notification sent to you by e-mail. Please check back frequently to see any updates or changes to this Notice.

COOKIE POLICY

Effective: December 1, 2018

This Cookie Policy explains how the Competency and Credentialing Institute ("CCI") uses cookies and similar technologies to recognize you when you visit our websites and applications. It explains what these technologies are and why we use them, as well as your rights to control our use of them. In some cases, we may use cookies to collect personal information, or that becomes personal information if we combine it with other information. In such cases our <u>Privacy Policy</u>, will apply in addition to this Cookie Policy.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We use first and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our online properties. Third parties serve cookies through our Websites for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first and third-party cookies served through our Websites and the purposes they perform are described below (please note that the specific cookies served may vary depending on the specific Online Properties you visit):

Analytics and customization cookies:

We may use a web analytics service, to record and analyze activity on our website. These cookies collect information that is used either in aggregate form to help us understand how our Website is being used, how effective our marketing campaigns are, or to help us customize our Website and applications in order to enhance the user experience. The Website or any such service may track

browsing across web sites that use the same service, may collect statistical data and/or IP address.

Advertising cookies:

These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests.

Social networking cookies:

Our Website interfaces with social media sites such as Facebook, LinkedIn, YouTube, Instagram, Pinterest, and Twitter and may include social media features such as the Facebook "like" button, widgets or interactive mini- programs that run on our Website. These features may collect your IP address, the type of browser you use, browsing information, and may set a cookie to enable the feature to function properly. These cookies are also used to enable you to share pages and content that you find interesting on our Website through third party social networking and other websites. Your interactions with these features are governed by the privacy policy of the party providing it. These cookies may also be used for advertising purposes too.

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics

files that contain a unique identifier that enable us to recognize when someone has visited our Websites or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Websites to another, to deliver or communicate with cookies, to understand whether you have come to our Websites from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of email marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Do you serve targeted advertising?

Third parties may serve cookies on your computer or mobile device to serve advertising through our Website. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify

your name, contact details or other details that directly identify you unless you choose to provide these.

How can I control cookies?

You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

How often will you update this Cookie Policy?

We may update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Policy regularly to stay informed about our use of cookies and related technologies.

Do Not Track Response

Certain web browsers may allow you to enable a "do not track" option that sends signals to the websites you visit indicating that you do not want your online activities tracked. This is different from blocking cookies as browsers with the "do not track" option selected may still accept cookies. Right now, there is no industry standard for how companies should respond to "do not track" signals, although one may be adopted in the future. We do not respond to "do not track" signals at this time. If we do so in the future, we will modify this Cookie Policy accordingly.

Where can I get further information?

If you have any questions about our use of cookies or other technologies, please contact us by mail, telephone, or email:

CCI Attn: Privacy Manager 2170 S. Parker Road, Suite #120 Denver, CO 80231 privacy@cc-institute.org